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June 8, 1999

FAA-99-6717-23

Federal Aviation Administration
Office of Chief Counsel
Rules Docket Office (29547)
800 Independence Avenue SW
Room 915-G
Washington, DC 20951

Re: Docket No. 29547

Gentlemen:

American Airlines has conducted North Atlantic **ETOPS** since 1985 with more than 140,000 crossings in Boeing 777 / 767 / 757 and Airbus A300. More recently we commenced **ETOPS** across the North Pacific with the Boeing 777.

Twin-engine airplanes conducting extended range operations are regulated to a much higher standard of system design and redundancy, powerplant reliability, maintenance, and operational procedures than three and four engine airplanes. The extensive statistical data compiled for **ETOPS** flights clearly demonstrates that twin-engine operations are at least as safe as three and four engine operations. Neither diversions nor accidents correlate with the number of engines on an extended range airplane.

The current 180-minute **ETOPS** rule is sufficient for operations in the North Atlantic and Central East Pacific (US to Hawaii), and on most days, the North Pacific. There are two routings across the North Pacific which satisfy the 180 minute rule for **ETOPS** flights: southerly, using Midway as an **enroute** alternate, or northerly, using one of the airports in the Aleutian Islands (Cold Bay, King Salmon or **Shemya**), or Eastern Russia (**Petropavlovsk**, **Magadan** or **Anadyr**) as **enroute** alternates on the segment between Anchorage and **Sapporo**.

Empirical weather data indicates that there are occasionally periods, perhaps three or four times a year, when all **enroute** alternate airports in the northerly route system between Anchorage and **Sapporo** fail to meet the forecast ceiling and visibility criteria to qualify as **enroute** alternate airports. During these periods, flights have two options under the 180 minute **ETOPS** rule: either fly the southerly route with only one airport, Midway, as the alternate, or operate even more northerly than normal so as to continuously remain within 60 minutes of an "adequate" airport as required by FAR 121.161. Adequate airport requirements are considerably lower than those of **ETOPS** suitable **enroute** alternate airports.

It should be noted that even if the existing **ETOPS** alternate airports do not qualify as suitable alternates because of forecast ceiling and visibility, the actual weather may be better than required landing minima and consequently the airport may be usable for diversion if necessary. The **207** minute **ETOPS** rule provides an additional option to the Captain and Dispatcher, allowing airplanes that meet specified criteria to operate on this segment without an **enroute** alternate other than Anchorage and **Sapporo**. On this route flights would operate about **195** minutes from Anchorage or **Sapporo** at the most distant point on the route.

The **207** minute **ETOPS** rule is a prudent evolution of procedures that have been extensively proven over many years. It recognizes the continual improvement of airplanes and powerplants that has made each advance in aviation operational capabilities possible. American Airlines strongly urges FAA approval of **207** minute **ETOPS**.

Sincerely,

Captain **C. D. Ewell, Jr.**
Vice President Flight and Chief Pilot

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